



December 8, 1995

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Mr. Lester Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Re: Public Workshop Information Package

Dear Lester:

Please consider the following comments to the December 4, 1995, Public Workshop Information Package on behalf of the Northern California Water Association (NCWA). NCWA currently represents 52 agricultural water suppliers and individual farmers who irrigate nearly 700,000 acres of farmland in the Sacramento Valley. Several of our members also deliver water to state and federal wildlife refuges and a large portion of this land also serves as important seasonal wetlands for migrating waterfowl, shorebirds and other wildlife.

First, we support the efforts of the CALFED Bay-Delta Program to develop a long-term coordinated solution for the Bay-Delta. The workshop on December 4, 1995, and the above-referenced information package reflect many hours of work by you and your staff and help begin the process of selecting viable alternatives for the long-term solution.

We appreciate the opportunity to share with you the following comments and suggestions regarding the draft actions contained in Appendix B. While we are aware that the Action Category Descriptions are characterized by very brief background descriptions, statements of purpose and constraints, we believe several of these actions should be clarified to reflect some of the following issues.

1. Establishment of Floodways and Meander Belts

In the Constraints section, we suggest you add reference to the fact that the creation of meander belts or floodways may result in the loss of productive farmland and the reduction in tax revenues to local economies.

2. Delta Waterfowl Habitat Management

Although we encourage the creation of Bay-Delta system waterfowl areas, we believe that rice and other small grain crops currently provide important seasonal wetland habitat values and should not be converted to managed wetlands. An important component of the CALFED

program should be to encourage cultivation of these types of crops, and recognition of their role improving habitat.

The constraint section omitted the loss of income caused by converting productive farmland or reducing annual productivity.

3. Restoration of Upstream Anadromous Fish Habitat/Improvements for Upstream Fish Passage

Restoration of Riparian Habitat/Restoration of Upstream Wetland Habitat

Because the four above listed actions have many similar components, we suggest that CALFED combine all or portions of these actions into one or two actions. For example, Wetland Habitat could be combined with Riparian Habitat and Anadromous Fish Habitat could be combined with Fish Passage.

In each case, we suggest the following comments on these actions. First, each action specifies that additional instream flows are necessary to achieve the stated purpose of the action. CALFED should acknowledge that upstream storage would assist in meeting these objectives. Accordingly, the constraints section for each action should recognize that acquiring instream flows will affect water rights and area of origin protections, reduce out of stream beneficial uses - including wildlife habitat, reduce farm and third party income and may be limited by the availability of water supplies for purchase. Additionally, establishing riparian habitat on levees may be constrained by flood control requirements.

4. Delta Inflow/Outflow/Export Management

The Description and Purpose section for this program adequately describes any of the actions affecting Delta inflows as they relate to upstream water use. Depending on the substance of these actions, the constraints section should recognize possible conflicts with water rights, area of origin, water supply contracts, water acquisition availability, loss of farm and third party income. We also recommend that additional upstream storage be specified as a component of meeting the objectives of these actions.

5. Increased Rates of Diversion Capacity

We recommend that the constraints sections recognize that there are technological problems associated with the Red Bluff Diversion Dam. For example, the research pumping plant is currently inoperable, forcing water users to pursue an emergency redirection permit on Stony Creek. As a result, farmers still do not have a stable supply of water during the irrigation season.

6. Acquisition of Long-Term Water Supplies for Fish and Wildlife

In the description section, we suggest that CALFED add Additional Upstream Storage as an action to assist in meeting these objectives.

We also recommend that CALFED add as constraints, that transferring water to instream uses may conflict with existing beneficial uses. Additionally, CALFED should recognize direct and indirect economic effects associated with water acquisition and land fallowing. These issues should be reconciled before new actions are undertaken.

7. Installation of and Improvement to Fish Screens

In addition to the constraints listed for this action, the National Marine Fisheries Service (NMFS) and the California Department of Fish and Game (CDFG) have separate criteria requirements, criteria has not been developed for all special status species (Splittail) and no regulatory assurances exist for water users. Additionally, no agency has prioritized the importance of screening specific diversions based on biological criteria.

8. Improvement in Fish Passage

As this action recommends instream flow, it is similar to the actions listed in number three above, and we suggest it be combined with these actions. We also recommend that the constraints of this action reflect those issues stated above.

9. Water Conservation

We suggest this category be retitled "Water Management" to reflect the concept that water conservation is only one of many actions that can be taken to more efficiently manage water. In addition to the items listed as constraints, we suggest CALFED recognize that certain water conservation practices may yield little, if any, real water savings, impact out of stream beneficial uses such as wildlife habitat, decrease crop yields due to salt loading and impact farm economies. In some cases, where water is used and reused, both within a district and within a regional area, on-farm water conservation efforts may increase overall water diversions and increase water quality concerns.

We also suggest that the water pricing paragraph be moved to the description section and that our comments relative to water conservation in general be applied to the water pricing concept as well.

10. Water Reclamation

Sacramento Valley agricultural water users currently use and reuse water supplies. In many cases, this tailwater is delivered to managed waterfowl areas and duck clubs and provides

habitat values in canal and ditches. We suggest that CALFED recognize this practice in the program description section.

11. Water Pricing

It appears that the rationale for this section is to encourage farmers to grow "high value crops." We suggest that you delete the second sentence in the purposes section. Worldwide agricultural commodity prices do not reflect the increased price of water. Also, the last sentence of this section may not be true in all cases. For example, if the goal is to increase the cost of water to encourage farmers to shift to economically "higher value" crops, in some cases, farmers may choose to grow crops that are less environmentally beneficial, and generate less overall economic impact.

Accordingly, in the constraints sections we suggest CALFED refer to the inability of farmers to "pass along" the increased cost of water. Higher costs for water will result in reduced farm income. Additionally, the traditional "high value" argument may decrease acreage of crops that provide the most wildlife habitat, and reductions in water deliveries to some areas may impact other beneficial uses.

12. Construction and Improvement of Conveyance Facilities

We suggest that you include water rights protections and area of origin considerations as other constraints for this action.

13. Changes in Locations of Diversions

When diversions are relocated, state and federal agencies will most likely require new fish screening facilities. Accordingly, we suggest you add the appropriate constraints listed in that section above for this action.

14. Water Transfers

In the description category, we suggest that you add water conservation/management and improved efficiency as other sources of water available for transfer. In the purposes section and constraints section, we request you delete reference to the words, "excess or unneeded water."

15. Management of Agricultural Drainage

In the description category, we suggest that CALFED recognize the successful efforts of the rice industry in managing agricultural drainage in the Sacramento Valley - intensive management programs have reduced levels of rice pesticides in the Sacramento River by over 99.8 %.

In the purposes section, we suggest CALFED recognize the fact that throughout the Sacramento Valley, constructed agricultural drains provide important habitat for hundreds of birds, mammals and amphibians, including 25 special status species of wildlife.

Accordingly, in the constraints sections, we suggest you acknowledge that reduction of drainage in these areas can reduce important habitat values. Also, reduced water supply in drains due to water conservation programs can increase concentrations of pesticides within drains, increasing salt loading and other water quality concerns while reducing habitat quality and crop yields.

16. Levee Maintenance and Stabilization

In the constraints section, we suggest you reference the possible conflict between flood control requirements and creation of habitat on levees.

17. Establishment of Long-Term Funding Mechanisms

Establishing a new tax or imposing a new financial requirement on water users will impact the economic viability of farming communities.

In Appendix D, Number three, Water Supply Availability and Beneficial Uses, we recommend you make reference to the fact that other environmental out of stream beneficial uses compete for water supplies.

We appreciate the opportunity to provide you with these comments and we look forward to working with you in the upcoming months in developing alternatives for long-term Bay-Delta solutions. If you have any questions comments, please call me directly.

Sincerely,



for Jeff J. Jaraczski

Member and Government Relations